

EXHIBIT A
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25 UNITED STATES DISTRICT COURT
26 NORTHERN DISTRICT OF CALIFORNIA
27 SAN JOSE DIVISION

28 CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all other
similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER REQUIRING
GOOGLE TO ADD CUSTODIANS AND
RUN ADDITIONAL SEARCHES FOR
CURRENT CUSTODIANS (DISPUTES
P1 AND P2)**

[PROPOSED] ORDER

Before the Court is Plaintiffs' request for an Order requiring Google to add custodians (Dispute P1) and to use additional searches for the current Google custodians (Dispute P2). Having considered Plaintiffs' requests, and good cause having been shown, the Court **GRANTS** Plaintiffs' requests and **ORDERS** as follows:

For Google custodians Glenn Bernston, Deepti Bhatnagar, Sabine Borsay, Greg Fair, Helen Harris, Abdelkarim Mardini, Justin Schuh, Dan Stone, Alexei Svitkine, Keith Wright, Adrienne Porter Felt, Sam Heft-Luthy, Russ Ketchum, and Chris Liao, Google shall run the following searches and produce additional responsive documents by September 10, 2021:

- Incognito
- Eprivacy OR (consent! /3 ready) OR consentless
- (summer OR privacy) /2 moment
- "[REDACTED] OR [REDACTED]
- GWS /10 (ID OR identif!)
- OTR OR (off /3 record)
- "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED] OR "[REDACTED]"
- [REDACTED]! OR [REDACTED] OR cookie!
- [REDACTED] OR "[REDACTED]"
- [REDACTED]
- [REDACTED]!
- Trusted /2 (surface OR space)
- [REDACTED]
- X-Client /10 (data OR header OR variation)
- [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]
- "[REDACTED]" OR [REDACTED] OR [REDACTED] OR [REDACTED] OR [REDACTED] OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED]! OR "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED]! OR [REDACTED] OR unauth!

In addition, to the extent Google has not agreed to add the Google employees identified below, the following employees shall be designated as custodians and, for each custodian, to the extent Google has not agreed to the searches underneath the custodians' name, Google shall run the searches and Google shall substantially complete production by September 10, 2021.

1. Ben Azose

- Incognito

- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED] OR [REDACTED]
- “Identifier! OR UID
- “opt out” OR “opt-out”
- [REDACTED] or “[REDACTED]”
- (tie OR tying OR link!) /5 (brows! OR session!)
- [REDACTED] OR [REDACTED] OR “[REDACTED]” or [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

2. Nina Ilieva

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED] OR [REDACTED]
- “Identifier! OR UID
- “opt out” OR “opt-out”
- [REDACTED] or “[REDACTED]”
- (tie OR tying OR link!) /5 (brows! OR session!)
- [REDACTED] OR [REDACTED] OR “[REDACTED]” or [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

3. Sammit Adhya

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- User! /15 (study OR studies OR understand! OR confuse!)
- “Identity management”
- “[REDACTED]” AND (fail* OR review* OR analy*)
- [REDACTED] OR “[REDACTED]” OR “[REDACTED]”
- (third OR 3rd OR 3d) /3 cookie*
- [REDACTED]* OR [REDACTED] OR pseudo*
- ePrivacy
- consent* /3 ready
- “[REDACTED]”
- account /3 particle
- [REDACTED] OR [REDACTED] OR “[REDACTED]” or [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

4. Suneeti Shah Vakharia

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- “[REDACTED]”
- User! /15 (understand! OR confuse!)

- Consent!
- [REDACTED] OR [REDACTED] OR [REDACTED]

5. Richard Jui-Chieh Hsu

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED]! OR [REDACTED] OR cookie!
- [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

6. Alex Ainslie

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED] OR “[REDACTED]”
- Histogram!
- (third OR 3rd OR 3d) /3 cookie!
- [REDACTED] OR [REDACTED] OR “[REDACTED]” OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

7. Arne de Booij

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- Consent!
- Unauth! OR “signed out”
- [REDACTED] OR [REDACTED] OR “[REDACTED]” OR [REDACTED] OR [REDACTED]
- Anonym! OR pseudonymous
- [REDACTED] OR [REDACTED] OR [REDACTED]

8. Benjamin Poiesz

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED] OR “[REDACTED]”
- [REDACTED] OR [REDACTED] OR “[REDACTED]” OR [REDACTED] OR [REDACTED]
- rev! /3 (share OR impact)
- [REDACTED] OR [REDACTED] OR [REDACTED]

9. Breen Baker

- Incognito
- inPrivate

- Private! /3 (brows! OR mode)
- [REDACTED]! OR [REDACTED] OR cookie!
- conver! OR track!
- Anonym! OR pseudonymous OR unauth!
- [REDACTED] OR [REDACTED] OR [REDACTED]

10. Brad Townsend

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- Firefox
- [REDACTED]! OR [REDACTED] OR cookie!
- conver! OR track! OR remarket!
- Anonym! OR pseudonymous OR unauth!
- consent!
- [REDACTED] OR [REDACTED] OR [REDACTED]

11. Chetna Bindra

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED]! OR [REDACTED] OR cookie!
- Anonym! OR pseudonymous OR unauth!
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR [REDACTED]

12. Chris Palmer

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- (User! OR people) /10 confus!
- Track!
- Cookie!
- [REDACTED] OR [REDACTED] OR [REDACTED]

13. David Monsees

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED]
- "[REDACTED]"
- (user! OR people) /10 (privacy OR consent!)
- [REDACTED] OR [REDACTED] OR [REDACTED]

14. Deepak Ravichandran

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- study AND (impact OR revenue OR sustain* OR advertis* OR publish*)
- SameSite
- nitish OR korula
- [REDACTED]
- [REDACTED]! OR [REDACTED] OR cookie!
- (user AND profile) AND (publish! OR remarket! OR rmktg)
- [REDACTED] OR [REDACTED] OR [REDACTED]

15. Dmitry Titov

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED]! OR [REDACTED] OR cookie!
- Anonym! OR pseudonymous OR unauth!
- Consent!
- Profile AND brows!
- [REDACTED]
- “Chrome Summit”
- [REDACTED] OR [REDACTED] OR [REDACTED]

16. Florian Uunk

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED]! OR [REDACTED] OR cookie!
- Anonym! OR pseudonymous OR unauth!
- [REDACTED] OR “[REDACTED]”
- [REDACTED] OR [REDACTED] OR “[REDACTED]” OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

17. Haskell Garon

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- (user OR data OR brows!) /25 (avichan! OR profit! OR revenue)
- [REDACTED] OR [REDACTED] OR “[REDACTED]” OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

18. Hyewon Jun

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- block! AND (impact! OR revenue! OR sustain! OR advertis! OR Mozilla OR Firefox OR Microsoft OR Edge)
- browser AND restrict* AND cookie!
- [REDACTED] OR [REDACTED] OR [REDACTED]
- [REDACTED]! OR [REDACTED] OR cookie!
- PPID OR ICM
- [REDACTED] OR [REDACTED] OR "[REDACTED]" or [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

19. Lorraine Twohill

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- Block! /5 cookie!
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

20. Michael Kleber

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED]! OR [REDACTED] OR cookie!
- Anonym! OR pseudonymous OR unauth!
- Ad! AND conver! AND track!
- Chrome AND conver! AND measure!
- [REDACTED] OR [REDACTED] OR "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

21. Mike Pinkerton

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR [REDACTED]

22. Nitish Korula

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED]! OR [REDACTED] OR cookie!

- study AND (impact OR revenue OR sustain* OR advertis* OR publish*)
- SameSite
- [REDACTED]
- (user AND profile) AND (publish! OR remarket! OR rmktg)
- [REDACTED] OR [REDACTED] OR [REDACTED]

23. Othar Hansson

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED] OR “[REDACTED]”
- (user OR user’s OR users OR data) /5 (transparen! OR control! OR consent!)
- [REDACTED] OR [REDACTED] OR “[REDACTED] or [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

24. Qi Dong

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED]! OR [REDACTED] OR cookie!
- Anonym! OR pseudonymous OR unauth!
- [REDACTED] OR [REDACTED] OR [REDACTED]

25. Rory McClelland

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- (third OR 3rd OR 3d) /3 cookie! [REDACTED] OR “[REDACTED]”
- [REDACTED] OR [REDACTED] OR “[REDACTED]” or [REDACTED] OR [REDACTED]
- track! OR antitrack! OR anti-track!
- [REDACTED] OR [REDACTED] OR [REDACTED]

26. Sree Pothana

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- Identifier! OR “user ID” OR gaia!
- [REDACTED]! OR [REDACTED] OR cookie!
- Log! OR plog!
- Anonym! OR pseudonymous OR unauth!
- [REDACTED] OR [REDACTED] OR [REDACTED]

27. Steve Hamilton

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR "[REDACTED]" or [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

28. Tim Hsieh

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- Cookie! OR DoubleClick
- CCPA OR (privacy /5 (law! OR regulation!))
- [REDACTED] OR [REDACTED] OR [REDACTED]

29. Vivek Sekhar

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- (third OR 3rd OR 3d) /3 cookie!
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR "[REDACTED]" or [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

30. Garth Shoemaker

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- Consent!
- [REDACTED] OR [REDACTED] OR "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

31. Ramin Halavati

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED] OR "[REDACTED]"
- Consent!
- Anonym! OR pseudonymous
- [REDACTED] OR [REDACTED] OR "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED]! OR [REDACTED]

32. Burton Rast

- Incognito

- inPrivate
- Private! /3 (brows! OR mode)
- (user! OR people) /10 (privacy OR consent!)
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR "[REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

33. Martin Shelton

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- OTR OR (off /3 record)
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR [REDACTED]" OR [REDACTED] OR [REDACTED]
- [REDACTED] OR [REDACTED] OR [REDACTED]

34. Luke Hedrick

- Incognito
- inPrivate
- Private! /3 (brows! OR mode)
- [REDACTED] OR "[REDACTED]"
- [REDACTED] OR [REDACTED] OR [REDACTED]

In addition, there will be at least 60 Google custodians. Plaintiffs must show good cause for additional Google custodians beyond 60. The deadline for adding additional Google custodians and searches shall be October 1.

IT IS SO ORDERED.

DATED: _____

Honorable Susan van Keulen
United States Magistrate Judge